

January 18, 2013

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Ms. Caroline DeBerry  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

**IDENTIFICATION NUMBER: C00467233**

**REFERENCE: OCTOBER QUARTERLY REPORT (08/18/2012—09/30/2012)**

Dear Ms. DeBerry,

This statement is in response to the Commission's letter dated December 14, 2012. The Commission requested additional information on five items.

First, the Commission requested clarification on contributions that appear to exceed federal limits. Individuals or Committees that appear to exceed the contribution limits do not. Any amount over the contribution limits has been refunded, reattributed within the 60 days, or re-designated to the Committee's General Election Account. These are reflected in subsequent reports. A few individuals were mistakenly over the limit due to duplicate records. As soon as the Committee was aware, contribution refunds were issued. These corrections are reflected on subsequent reports.

Second, the Commission requested clarification on earmarked contributions through a conduit. All donors who contribute through a conduit are itemized if their individual aggregate is over \$200 pursuant to FEC regulations. The total amount earmarked by the conduit as shown in Line 11(c) of the report and the contributions disclosed in Line 11(a) differ by an amount that represents unitemized contributions. No further itemization is required under FEC regulations.

Third, the Commission has requested clarification on disbursements with the following descriptions: "Campaign Promotional Items" and "Operations Consulting." Clarification will be provided in Amended Reports.

Fourth, our disbursement to "Petty Cash" comports with the standards outlined in the Commission's letter.

Fifth, the Committee has reviewed all reimbursements to individuals for travel and subsistence and confirms that no further itemization is required under any Commission regulations for these expenditures.

This should answer the Commission's inquiry.

Sincerely,  
Bradley T. Crate  
Treasurer

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